

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF TEXAS  
DALLAS DIVISION**

BASCOM GLOBAL INTERNET SERVICES,  
INC.,

Plaintiff,

v.

AT&T CORP.,

Defendant.

**Civil Action No. 3:14-cv-3942-M**

JURY TRIAL DEMANDED

**BASCOM'S MOTION TO COMPEL**

For the reasons set forth in the accompanying memorandum of law in support, plaintiff BASCOM Global Internet Services, Inc. (“BASCOM”) respectfully moves the Court for an order compelling AT&T Corp. (“AT&T”) to (1) produce relevant and responsive licenses; (2) produce unredacted versions of documents that AT&T either redacted or withheld completely for confidentiality; (3) produce e-mail responsive to BASCOM’s final e-mail requests; (4) produce information depicting the number of seat licenses sold and volume of requests for the accused products; and (5) provide access to the accused offerings.

This motion is accompanied by BASCOM’s Memorandum of Law in Support of Motion to Compel.

Dated: December 18, 2017

Respectfully submitted,

By: /s/ Arun Subramanian

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**ATTORNEYS FOR PLAINTIFF  
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**CERTIFICATE OF CONFERENCE**

I hereby certify that, as described and shown in the supporting memorandum and accompanying appendix, counsel for BASCOM and counsel for AT&T met and conferred regarding the issues raised in BASCOM's motion multiple times, telephonically and by e-mail. In addition, before filing the instant motion, BASCOM provided counsel for AT&T a draft motion and an opportunity to confirm it would provide the requested information or otherwise respond.

*/s/ Tamar Luszttig* \_\_\_\_\_  
Tamar Luszttig

**CERTIFICATE OF SERVICE**

I hereby certify that on December 18, 2017, all counsel of record who are deemed to have consented to electronic service are being served with a copy of this document via the Court's CM/ECF system.

*/s/ Tamar Luszttig* \_\_\_\_\_  
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